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July 25, 2023

Via ECF

Hon. Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007


The request is granted. In light of the length of the extension, the Court is unlikely to grant further extension requests absent a showing of good cause. IT IS HEREBY ORDERED that the parties shall submit a Proposed Civil Case Management Plan and Scheduling Order consistent with this letter no later than **August 1, 2023**.

Dated: July 25, 2023

New York, New York

Re: *Daniel Carille v. National Passenger Railroad Corporation (AMTRAK)*
Index No.: 22-cv-10952 (JLR)

SQ ORDERED


JENNIFER L. ROCHON
United States District Judge

Dear Judge Rochon:

We represent Defendant National Railroad Passenger Corporation (“Amtrak”) in the above-referenced matter. We write with Plaintiff’s consent to respectfully notify the Court, pursuant to Your Honor’s April 4, 2023 Mediation Referral Order, that the parties believe that mediation is premature and therefore would not be helpful at this time, as discovery is ongoing and depositions have not yet been conducted. The parties have exchanged discovery demands, which includes demands for authorizations to obtain, *inter alia*, medical and social media information, but have not yet exchanged responses or conducted depositions. Accordingly, the parties further respectfully request a ninety (90) day adjournment of the current discovery deadlines and post-discovery pre-trial conference, as indicated below, to provide further time to exchange discovery, process and review authorizations, and conduct depositions:

- Deadline for completion of depositions, currently scheduled for July 17, 2023, to be adjourned ninety (90) days, to October 16, 2023,
- Deadline for completion of fact discovery, currently scheduled for August 2, 2023, to be adjourned ninety (90) days, to October 31, 2023,
- Deadline for Plaintiff’s expert disclosures, currently scheduled for August 16, 2023, to be adjourned ninety (90) days, to November 14, 2023,

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- Deadline for Defendant's expert disclosures, currently scheduled for September 1, 2023, to be adjourned ninety (90) days, to November 30, 2023,
- Deadline for completion of all expert discovery, currently scheduled for September 18, 2023, to be adjourned ninety (90) days, to December 18, 2023,
- Deadline for the completion of all discovery, currently scheduled for September 18, 2023, to be adjourned ninety (90) days, to December 18, 2023,
- Adjournment of the post-discovery pre-trial conference, currently scheduled for October 11, 2023, to be rescheduled to: January 9, 2023, January 10, 2023, or January 11, 2023, or such date as may be convenient for the Court.

This is the first request for an adjournment or extension of time in this matter.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ *Matthew P. Moccia*
Matthew P. Moccia

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